Georgetown Primary School

Online Safety Policy

Development/monitoring/review of this policy

This online safety policy has been developed by a working group/committee made up of:

- *Headteacher/senior leaders*
- *Online safety officer/coordinator*
- *Staff – including practitioners//support staff/technical staff*
- *Governors*
- *Parents and carers*
- *Community users.*

Consultation with the whole school community has taken place through a range of formal and informal meetings.

Schedule for development/monitoring/review

This online safety policy was approved by the *governing body/governors sub-committee on:*	23 September 2021
The implementation of this online safety policy will be monitored by the:	Governing Body
Monitoring will take place at regular intervals:	Half Termly
The *governing body/governors sub-committee* will receive a report on the implementation of the online safety policy generated by the monitoring group (which will include anonymous details of online safety incidents) at regular intervals:	Annually
The online safety policy will be reviewed annually, or more regularly in the light of any significant new developments in the use of the technologies, new threats to online safety or incidents that have taken place. The next anticipated review date will be:	September 2022
Should serious online safety incidents take place, the following external persons/agencies should be informed:	Governors, SRS, BGCBC

The school will monitor the impact of the policy using:

- *Logs of reported incidents*
- *Monitoring logs of internet activity (including sites visited)*
- *Internal monitoring data for network activity*
- *Surveys/questionnaires of:*
    - *learners*
    - *parents and carers*
    - *staff.*

Roles and responsibilities

The following section outlines the online safety roles and responsibilities of individuals and groups within the school.

Governors

Governors are responsible for the approval of the online safety policy and for reviewing the effectiveness of the policy. This will be carried out by the G*overning Body/governor's sub-committee* receiving regular information about online safety incidents and monitoring reports. A member of the Governing Body should take on the role of online safety governor to include:

- regular meetings with the online safety coordinator/officer
- regular monitoring of online safety incident logs
- regular monitoring of filtering change control logs and monitoring of filtering logs (where possible)
- reporting to relevant governors/sub-committee/meeting.

Headteacher and senior leaders

- The headteacher has a duty of care for ensuring the safety (including online safety) of members of the school community, though the day to day responsibility for online safety may be delegated to the online safety coordinator/officer
- The headteacher and (at least) another member of the senior leadership team should be aware of the procedures to be followed in the event of a serious online safety allegation being made against a member of staff
- The headteacher/senior leaders are responsible for ensuring that the online safety coordinator/officer and other relevant staff receive suitable training to enable them to carry out their online safety roles and to train other colleagues, as relevant
- The headteacher/senior leaders will ensure that there is a system in place to allow for monitoring and support of those in school who carry out the internal online safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles
- The headteacher/senior leaders will receive regular monitoring reports from the online safety coordinator/officer

Online safety coordinator/officer

The online safety coordinator/officer:

- leads the online safety group
- takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies/documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place.
- provides (or identifies sources of) training and advice for staff
- liaises with the local authority/relevant body
- liaises with (school/local authority) technical staff
- receives reports of online safety incidents and creates a log of incidents to inform future online safety developments
- meets regularly with online safety governor to discuss current issues, review incident logs and if possible, filtering change control logs
- attends relevant meeting/sub-committee of governors
- reports regularly to the headteacher/senior leadership team.

Network manager/technical staff

The network manager/technical staff (or local authority/managed service provider) is responsible for ensuring that:

- the *school* technical infrastructure is secure and is not open to misuse or malicious attack
- the school meets (as a minimum) the required online safety technical requirements as identified by the local authority or other relevant body and also the online safety policy/guidance that may apply
- users may only access the networks and devices through a properly enforced password protection policy, in which passwords are regularly changed
- they keep up-to-date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of the *network/internet/learning platform/Hwb/remote access/e-mail* is regularly monitored in order that any misuse/attempted misuse can be reported to the *headteacher/senior leader; online safety coordinator/officer* for investigation/action/sanction
- *the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person*. This is actioned and reviewed by SRS.

Teaching and support staff

These individuals are responsible for ensuring that:

- they have an up-to-date awareness of online safety matters and of the current school online safety policy and practices
- they have read, understood and signed the staff acceptable use agreement (AUA)
- they report any suspected misuse or problem to the *headteacher/senior leader; online safety coordinator/officer* for investigation/action
- all digital communications with learners/parents and carers should be on a professional level *and only carried out using official school systems*
- online safety issues are embedded in all aspects of the curriculum and other activities
- learners understand and follow the online safety and acceptable use agreements
- learners have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies with regard to these devices
- In lessons where internet use is pre-planned, learners should be guided to sites checked as suitable for their use *and that processes are in place for dealing with any unsuitable material that is found in internet searches.*

Designated senior person

The designated senior person should be trained in online safety issues and be aware of the potential for serious safeguarding issues to arise from:

- sharing of personal data
- access to illegal/inappropriate materials
- inappropriate online contact with adults/strangers
- potential or actual incidents of grooming
- online bullying.

.

Online safety group

The online safety group[1] provides a consultative group that has wide representation from the school community, with responsibility for issues regarding online safety and monitoring the online safety policy including the impact of initiatives. Depending on the size or structure of the school this group may be part of the safeguarding group. The group will also be responsible for regular reporting to senior leaders and the governing body.

Members of the online safety group (or other relevant group) will assist the online safety coordinator/officer (or other relevant person, as above) with:

- the production/review/monitoring of the school online safety policy/documents
- *the production/review/monitoring of the school filtering policy (if possible and if the school chooses to have one) and requests for filtering changes*
- mapping and reviewing the online safety education provision – ensuring relevance, breadth and progression
- monitoring network/internet/incident logs where possible
- consulting stakeholders – including parents/carers and the learners about the online safety provision
- monitoring improvement actions identified through use of the 360 degree safe Cymru self review tool.

An online safety group terms of reference template can be found in the appendices.

Learners

These individuals:

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement (this should include personal devices – where allowed)
- should have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- will be expected to know and understand policies on the use of mobile devices and digital cameras. They should also know and understand policies on the taking/use of images and on online bullying
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the school's online safety policy covers their actions out of school, if related to their membership of the school.

Parents and carers

Parents and carers play a crucial role in ensuring that their children understand the need to use the internet/mobile devices in an appropriate way. The school will take every opportunity to help parents and carers understand these issues through *parents/carers evenings, newsletters, letters, website, Hwb, learning platform and information about national/local online safety campaigns/literature.*
Parents and carers will be encouraged to support the school in promoting good online safety practice and to follow guidelines on the appropriate use of:

- digital and video images taken at school events
- access to parents/carers sections of the website, Hwb, learning platform and online learner records
- their children's personal devices in the school (where this is allowed).

1

Community users
Community users who access school systems/website/Hwb/learning platform as part of the wider school provision will be expected to sign a community user AUA before being provided with access to school systems.

Policy statements

Education – learners
While regulation and technical solutions are very important, their use must be balanced by educating learners to take a responsible approach. The education of learners in online safety is therefore an essential part of the school's online safety provision. Learners need the help and support of the school to recognise and avoid online safety risks and build their resilience.

Online safety should be a focus in all areas of the curriculum and staff should reinforce online safety messages across the curriculum. The online safety curriculum should be broad, relevant and provide progression, with opportunities for creative activities and will be provided in the following ways (Note: statements will need to be adapted, depending on school structure and the age of the learners).

- A planned online safety curriculum across a range of subjects, (e.g. ICT/PSE/DCF) and topic areas and should be regularly revisited.
- Key online safety messages should be reinforced as part of a planned programme of assemblies and tutorial/pastoral activities.
- Learners should be taught in all lessons to be critically aware of the materials/content they access online and be guided to validate the accuracy of information.
- Learners should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the internet.
- Learners should be supported in building resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making.
- Learners should be helped to understand the need for the learner acceptable use agreement and encouraged to adopt safe and responsible use both within and outside school.
- Staff should act as good role models in their use of digital technologies, the internet and mobile devices.
- In lessons where internet use is pre-planned, it is best practice that learners should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches.
- Where learners are allowed to freely search the internet, staff should be vigilant in monitoring the content of the websites the young people visit.
- It is accepted that from time to time, for good educational reasons, students may need to research topics, (e.g. racism, drugs, discrimination) that would normally result in internet searches being blocked. In such a situation, staff can request that the technical staff (or other nominated person) can temporarily remove those sites from the filtered list for the period of study. Any request to do so, should be auditable, with clear reasons for the need.

Education – parents and carers
Many parents and carers have only a limited understanding of online safety risks and issues, yet they play an essential role in the education of their children and in the monitoring/regulation of the children's online behaviours. Parents may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

The school will therefore seek to provide information and awareness to parents and carers through:

- *curriculum activities*

- *letters, newsletters, web site, learning platform, Hwb*
- *parents and carers evenings/sessions*
- *high profile events/campaigns, e.g. Safer Internet Day*
- *reference to the relevant web sites/publications, e.g.* hwb.wales.gov.uk/ www.saferinternet.org.uk/ www.childnet.com/parents-and-carers

Education – the wider community

The school will provide opportunities for local community groups/members of the community to gain from the school's online safety knowledge and experience. This may be offered through the following:

- providing family learning courses in use of new digital technologies, digital literacy and online safety
- online safety messages targeted towards grandparents and other relatives as well as parents.
- the school learning platform, Hwb, website will provide online safety information for the wider community
- supporting community groups, e.g. early years settings, childminders, youth/sports/voluntary groups to enhance their online safety provision.

Education and training – staff/volunteers

It is essential that all staff receive online safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- a planned programme of formal online safety training will be made available to staff. This will be regularly updated and reinforced. An audit of the online safety training needs of all staff will be carried out regularly. *It is expected that some staff will identify online safety as a training need within the performance management process*
- all new staff should receive online safety training as part of their induction programme, ensuring that they fully understand the school online safety policy and acceptable use agreements.
- *the online safety coordinator/officer (or other nominated person) will receive regular updates through attendance at external training events, (e.g. from Consortium/SWGfL/LA/other relevant organisations) and by reviewing guidance documents released by relevant organisations*
- *this online safety policy and its updates will be presented to and discussed by staff in staff/team meetings/INSET days*
- *the online safety coordinator/officer (or other nominated person) will provide advice/guidance/training to individuals as required.*

Training – governors

Governors should take part in online safety training/awareness sessions, with particular importance for those who are members of any sub-committee/group involved in technology/online safety/health and safety/safeguarding. This may be offered in a number of ways such as:

- attendance at training provided by the local authority/National Governors Association/or other relevant organisation, (e.g. SWGfL)
- participation in school training/information sessions for staff or parents

Technical – infrastructure/equipment, filtering and monitoring

If the school has a managed ICT service provided by an outside contractor, it is the responsibility of the school to ensure that the managed service provider carries out all the online safety measures that would otherwise be the responsibility of the school, as suggested below. It is also important that the managed service provider is fully aware of the school online safety policy/acceptable use agreements. The school should also check their local authority/other relevant body policies on these technical issues if the service is not provided by the authority.

The school will be responsible for ensuring that the school infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their online safety responsibilities:

- School technical systems will be managed in ways that ensure that the school meets recommended technical requirements
- There will be regular reviews and audits of the safety and security of school technical systems.
- Servers, wireless systems and cabling must be securely located and physical access restricted.
- Good practice in preventing loss of data from ransomware attacks requires a rigorous and verified back-up routine, including the keeping of copies off-site.
- All school networks and system will be protected by secure passwords.
- The master account passwords for the school systems should be kept in a secure place, e.g. school safe. Consideration should also be given to using two factor authentication for such accounts
- All users have clearly defined access rights to school technical systems and devices. Details of the access rights available to groups of users will be recorded by the Network Manager (or other person) and will be reviewed, at least annually, by the online safety
- All users (adults and learners) have responsibility for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security.
- Passwords must not be shared with anyone.
- All users will be provided with a username and password by SRS who will keep an up to date record of users and their usernames
- Passwords should be long. Good practice highlights that passwords over 12 characters in length are more difficult to crack. Passwords generated by using a combination of unconnected words that are over 16 characters long are extremely difficult to crack. Password length trumps any other special requirements such as uppercase/lowercase letters, number and special characters. Passwords should be easy to remember, but difficult to guess or crack.
- Records of learner usernames and passwords for Foundation Phase learners can be kept in an electronic or paper-based form, but they must be be securely kept when not required by the user. *Password complexity in foundation phase should be reduced (for example 6 character maximum) and should not include special characters. Where external systems have different password requirements the use of random words or sentences should be encouraged.*
- Password requirements for learners at Key Stage 2 and above should increase as learners progress through school.
- Schools Office is responsible for ensuring that software licence logs are accurate and up-to-date and that regular checks are made to reconcile the number of licences purchased against the number of software installations
- Internet access is filtered for all users. Illegal content (child sexual abuse images) is filtered by the broadband or filtering provider by actively employing the Internet Watch Foundation CAIC list. Content lists are regularly updated and internet use is logged and regularly monitored. There is a clear process in place to deal with requests for filtering changes
- *The school has (if possible) provided enhanced/differentiated user-level filtering* (allowing different filtering levels for different ages/stages and different groups of users: staff/learners, etc.).
- Internet filtering should ensure that children are safe from terrorist and extremist material when accessing the internet.
- Where possible, school technical staff regularly monitor and record the activity of users on the school technical systems and users are made aware of this in the acceptable use agreement.

- An appropriate system is in place for users to report any actual/potential technical incident/security breach to the relevant person, as agreed).
- Appropriate security measures are in to protect the servers, firewalls, routers, wireless systems, work stations, mobile devices, etc., from accidental or malicious attempts which might threaten the security of the school systems and data. These are tested regularly. The school infrastructure and individual workstations are protected by up to date virus software.
- An agreed policy is in place for the provision of temporary access of 'guests', (e.g. trainee teachers, supply teachers, visitors) onto the school systems.
- An agreed policy is in place regarding the extent of personal use that users (staff/learners/community users) and their family members are allowed on school devices that may be used out of school.
- An agreed policy is in place that allows staff to/forbids staff from downloading executable files and installing programmes on school devices.

An agreed policy is in place regarding the use of removable media (e.g. memory sticks/CDs/DVDs) by users on school devices. Personal data cannot be sent over the internet or taken off the school site unless safely encrypted or otherwise secured.

Mobile technologies

Mobile technology devices may be school owned/provided or personally owned and might include smartphone, tablet, notebook/laptop or other technology that usually has the capability of utilising the school's/college's wireless network. The device then has access to the wider internet which may include the school learning platform and other cloud-based services such as e-mail and data storage.

All users should understand that the primary purpose of the use of mobile/personal devices in a school context is educational. The mobile technologies policy should be consistent with and inter-related to other relevant school policies including but not limited to those for safeguarding, behaviour, anti-bullying, acceptable use, and policies around theft or malicious damage. Teaching about the safe and appropriate use of mobile technologies should be an integral part of the school's online safety education programme.

In preparing a mobile technologies policy the school should consider possible issues and risks. These may include:

- security risks in allowing connections to your school network
- filtering of personal devices
- breakages and insurance
- access to devices for all learners
- avoiding potential classroom distraction
- network connection speeds, types of devices
- charging facilities
- total cost of ownership.

A range of mobile technology implementations is possible.

For further reading, please refer to the *NEN Technical Strategy Guidance Note 5 – Bring your own device* - /www.nen.gov.uk/advice/bring-your-own-device-byod

A more detailed mobile technologies policy template can be found in the Appendix. The school may however choose to include these aspects of their policy in a comprehensive acceptable use agreement, rather than in a separate mobile technologies policy. It is suggested that the school should in this overall policy document outline the main points from their agreed policy. A checklist of points to be considered is included below.

- The school acceptable use agreements for staff, learners, parents and carers will give consideration to the use of mobile technologies.
- The school allows: (the school should complete the table below to indicate which devices are allowed and define their access to school systems).

	School devices			**Personal devices**		
	School owned for individual use	School owned for multiple users	Authorised device[2]	Student owned	Staff owned	Staff owned
Allowed in school	Yes	Yes	Yes	Yes/No[3]	Yes/No	Yes/No
Full network access	Yes	Yes	Yes	Yes/No[4]	Yes/No	Yes/No
Internet only	Yes	Yes	Yes	Yes/No[5]	Yes/No	Yes/No
No network access	Yes	Yes	Yes	Yes/No[6]	Yes/No	Yes/No

Aspects that the school may wish to consider and include in their online safety policy, mobile technologies policy or acceptable use agreements include the following:

School owned/provided devices:

- Who they will be allocated to.
- Where, when and how their use is allowed – times/places/in/out of school.
- If personal use is allowed.
- Levels of access to networks/internet (as above).
- Management of devices/installation of apps/changing of settings/monitoring.
- Network/broadband capacity.
- Technical support.
- Filtering of devices.
- Access to cloud services.
- Data protection.
- Taking/storage/use of images.
- Exit processes, what happens to devices/software/apps/stored data if user leaves the school.
- Liability for damage.
- Staff training.

Personal devices

- Which users are allowed to use personal mobile devices in school (staff/learners/visitors).
- Restrictions on where, when and how they may be used in school.
- Storage.
- Whether staff will be allowed to use personal devices for school business.
- Levels of access to networks/internet (as above).
- Network/broadband capacity.

[2] Authorised device – purchased by the learner/family through a school-organised scheme. This device may be given full access to the network as if it were owned by the school.
[3] The school should add below any specific requirements about the use of mobile/personal devices in school.
[4] The school should add below any specific requirements about the use of mobile/personal devices in school.
[5] The school should add below any specific requirements about the use of mobile/personal devices in school.
[6] The school should add below any specific requirements about the use of mobile/personal devices in school.

- Technical support (this may be a clear statement that no technical support is available).
- Filtering of the internet connection to these devices.
- Data protection.
- Taking/storage/use of images.
- Liability for loss/damage or malfunction following access to the network (likely to be a disclaimer about school responsibility).
- Identification/labelling of personal devices.
- How visitors will be informed about school requirements.
- How education about the safe and responsible use of mobile devices is included in the school online safety education programmes.

Use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and learners instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents and carers and learners need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for online bullying to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term. It is common for employers to carry out internet searches for information about potential and existing employees. The school will inform and educate users about these risks and will implement policies to reduce the likelihood of the potential for harm.

- When using digital images, staff should inform and educate learners about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet, e.g. on social networking sites**.**
- In accordance with guidance from the Information Commissioner's Office, parents/carers are welcome to take videos and digital images of their children at school events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should not be published/made publicly available on social networking sites, nor should parents/carers comment on any activities involving other learners in the digital/video images.
- Staff and volunteers are allowed to take digital/video images to support educational aims, but must follow school policies concerning the sharing, distribution and publication of those images. Those images should only be taken on school equipment.
- Care should be taken when taking digital/video images that learners are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute.
- Learners must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include learners will be selected carefully and will comply with good practice guidance on the use of such images.
- Learners' full names will not be used anywhere on a website or blog, particularly in association with photographs.
- Written permission from parents or carers will be obtained before photographs of learners are published on the school website.
- Learners' work can only be published with the permission of the learner and parents or carers.

Data protection

Personal data will be recorded, processed, transferred and made available according to the current data protection legislation.

The school must ensure that:

- it has a Data Protection Policy.
- it implements the data protection principles and is able to demonstrate that it does so.
- it has paid the appropriate fee Information Commissioner's Office (ICO)
- it has appointed an appropriate Data Protection Officer (DPO) who has a high level of understanding of data protection law and is free from any conflict of interest. The school may also wish to appoint a Data Manager and Systems Controllers to support the DPO
- it has an 'information asset register' in place and knows exactly what personal data it holds, where, why and which member of staff has responsibility for managing it
- the information asset register lists the lawful basis for processing personal data (including, where relevant, consent). Where special category data is processed, an additional lawful basis will have also been listed
- it will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for. The school should develop and implement a 'retention schedule" to support this
- data held must be accurate and up to date where this is necessary for the purpose you hold it for. Have systems in place to identify inaccuracies, such as asking parents to check emergency contact details at suitable intervals
- it provides staff, parents, volunteers, teenagers and older children with information about how the school / college looks after their data and what their rights are in a clear Privacy Notice (see Privacy Notice section in the appendix)
- procedures must be in place to deal with the individual rights of the data subject, e.g. one of the dozen rights applicable is that of Subject Access which enables an individual to see to have a copy of the personal data held about them
- data Protection Impact Assessments (DPIA) are carried out where necessary. For example, to ensure protection of personal data when accessed using any remote access solutions, or entering into a relationship with a new supplier
- IT system security is ensured and regularly checked. Patches and other security essential updates are applied promptly to protect the personal data on the systems. Administrative systems are securely ring fenced from systems accessible in the classroom/to learners
- it has undertaken appropriate due diligence and has GDPR compliant contracts in place with any data processors
- it understands how to share data lawfully and safely with other relevant data controllers. In Wales, schools and colleges should consider using the Wales Accord on Sharing Personal Information toolkit to support regular data sharing between data controllers
- there are clear and understood policies and routines for the deletion and disposal of data
- it reports any relevant breaches to the Information Commissioner within 72hrs of becoming aware of the breach as required by law. It also reports relevant breaches to the individuals affected as required by law. In order to do this it has a policy for reporting, logging, managing, investigating and learning from information risk incidents.
- If a maintained school, it must have a Freedom of Information Policy which sets out how it will deal with FOI requests.
- all staff receive data protection training at induction and appropriate refresher training thereafter. Staff undertaking particular data protection functions, such as handling requests under the individual's rights, will receive training appropriate for their function as well as the core training provided to all staff.

When personal data is stored on any mobile device or removable media the:

- data must be encrypted and password protected.
- device must be password protected.
- device must be protected by up to date virus and malware checking software
- data must be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete.

Staff must ensure that they:

- at all times take care to ensure the safekeeping of personal data, minimising the risk of its loss or misuse
- can recognise a possible breach, understand the need for urgency and know who to report it to within the school
- can help data subjects understand their rights and know how to handle a request whether verbal or written. Know who to pass it to in the school
- only use encrypted mobile devices (including USBs) for personal data, particularly when it is about children
- will not transfer any school personal data to personal devices except as in line with school policy
- use personal data only on secure password protected computers and other devices, ensuring that they are properly "logged-off" at the end of any session in which they are using personal data
- transfer data using encryption and secure password protected devices.

Communication technologies

A wide range of rapidly developing communications technologies has the potential to enhance learning. The following table shows how the school currently considers the benefit of using these technologies for education outweighs their risks/disadvantages:

	Staff and other adults			**Learners**				
	Allowed	Allowed at certain times	Allowed for selected staff	Not allowed	Allowed	Allowed at certain times	Allowed with staff permission	Not allowed
Mobile phones may be brought to school								
Use of mobile phones in lessons								
Use of mobile phones in social time								
Taking photos on mobile phones/cameras								
Use of other mobile devices, e.g. tablets, gaming devices								

Use of personal e-mail addresses in school, or on school network								
Use of school e-mail for personal e-mails								
Use of messaging apps								
Use of social media								
Use of blogs								

The school may also wish to add some of the following policy statements about the use of communications technologies, in place of, or in addition to the above table.

When using communication technologies the school considers the following as good practice:

- the official school e-mail service may be regarded as safe and secure and is monitored. Users should be aware that e-mail communications are monitored. *Staff and learners should therefore use only the school email service to communicate with others when in school, or on school systems (e.g. by remote access)*
- users must immediately report to the nominated person – in accordance with the school policy – the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication
- any digital communication between staff and learners or parents/carers (e-mail, chat, learning platform, etc.) must be professional in tone and content**.** *These communications may only take place on official (monitored) school systems. Personal e-mail addresses, text messaging or social media must not be used for these communications*
- *whole class/group e-mail addresses may be used at Foundation Stage , while learners at Key Stage 2 and above will be provided with individual school e-mail addresses for educational use.*
- *learners should be taught about online safety issues, such as the risks attached to the sharing of personal details. They should also be taught strategies to deal with inappropriate communications and be reminded of the need to communicate appropriately when using digital technologies.*
- *personal information should not be posted on the school website and only official e-mail addresses should be used to identify members of staff*

Social media

With an increase in use of all types of social media for professional and personal purposes a policy that sets out clear guidance for staff to manage risk and behaviour online is essential. Core messages should include the protection of learners, the school and the individual when publishing any material online.

Expectations for teachers' professional conduct are set out by the General Teaching Council Wales (GTCW) but all adults working with children and young people must understand that the nature and responsibilities of their work place them in a position of trust and that their conduct should reflect this.

All schools/colleges and local authorities have a duty of care to provide a safe learning environment for learners and staff. Schools/colleges and local authorities could be held responsible, indirectly for acts of their employees in the course of their employment. Staff members who harass, bully online, discriminate on the grounds of sex, race or disability or who defame a third party may render the school or local authority liable to the injured party. Reasonable steps to prevent predictable harm must be in place. All staff working at any educational establishment are expected to demonstrate a

professional approach and respect for learners and their families and for colleagues and the learning setting.

The school provides the following measures to ensure reasonable steps are in place to minimise risk of harm to learners through:

- ensuring that personal information is not published
- training being provided including acceptable use, social media risks, checking of settings, data protection and reporting issues
- clear reporting guidance, including responsibilities, procedures and sanctions
- risk assessment, including legal risk.

School staff should ensure that:

- no reference should be made in social media to learners, parents and carers or school staff
- they do not engage in online discussion on personal matters relating to members of the school community
- personal opinions should not be attributed to the school or local authority
- security settings on personal social media profiles are regularly checked to minimise risk of loss of personal information.

When official school social media accounts are established there should be:

- a process for approval by senior leaders
- clear processes for the administration and monitoring of these accounts – involving at least two members of staff
- a code of behaviour for users of the accounts
- systems for reporting and dealing with abuse and misuse
- understanding of how incidents may be dealt with under school disciplinary procedures.

Personal use

- Personal communications are those made via a personal social media accounts. In all cases, where a personal account is used which associates itself with, or impacts on, the school it must be made clear that the member of staff is not communicating on behalf of the school with an appropriate disclaimer. Such personal communications are within the scope of this policy.
- Personal communications which do not refer to or impact upon the school are outside the scope of this policy.
- Where excessive personal use of social media in school is suspected, and considered to be interfering with relevant duties, disciplinary action may be taken.
- *The school permits reasonable and appropriate access to private social media sites.*

Monitoring of public social media

- As part of active social media engagement, it is considered good practice to pro-actively monitor the Internet for public postings about the school..
- The school should effectively respond to social media comments made by others according to a defined policy or process.

School use of social media for professional purposes will be checked regularly by a senior leader and online safety group to ensure compliance with the social media, data protection, communications, digital image and video policies.

Unsuitable/inappropriate activities

Some internet activity such as accessing child abuse images or distributing racist material is illegal and would obviously be banned from school and all other technical systems. Other activities such as online bullying would be banned and could lead to criminal prosecution. There are however a range of

activities which may, generally, be legal but would be inappropriate in a school context, either because of the age of the users or the nature of those activities.

The school believes that the activities referred to in the following section would be inappropriate in a school context and that users, as defined below, should not engage in these activities in, or out of, school when using school equipment or systems. The school policy restricts usage as follows.

User actions		Acceptable	Acceptable at certain times	Acceptable for nominated users	Unacceptable	Unacceptable and illegal
Users shall not visit internet sites, make, post, download, upload, data transfer, communicate or pass on, material, remarks, proposals or comments that contain or relate to:	child sexual abuse images – the making, production or distribution of indecent images of children, contrary to The Protection of Children Act 1978					X
	grooming, incitement, arrangement or facilitation of sexual acts against children Contrary to the Sexual Offences Act 2003					X
	possession of an extreme pornographic image (grossly offensive, disgusting or otherwise of an obscene character), contrary to the Criminal Justice and Immigration Act 2008					X
	criminally racist material in UK – to stir up religious hatred (or hatred on the grounds of sexual orientation) - contrary to the Public Order Act 1986					X
	pornography				X	
	promotion of any kind of discrimination				X	
	threatening behaviour, including promotion of physical violence or mental harm				X	
	promotion of extremism or terrorism				X	
	any other information which may be offensive to colleagues or breaches the integrity of the ethos of the school or brings the school into disrepute				X	
Using school systems to run a private business					X	
Using systems, applications, websites or other mechanisms that bypass the filtering or other safeguards employed by the school					X	

Infringing copyright				X	
Revealing or publicising confidential or proprietary information, (e.g. financial/personal information, databases, computer/network access codes and passwords)				X	
Creating or propagating computer viruses or other harmful files				X	
Unfair usage (downloading/uploading large files that hinders others in their use of the internet)				X	
Online gaming (educational)			X		
Online gaming (non educational)				X	
Online gambling				X	
Online shopping/commerce				X	
File sharing			X		
Use of social media		X			
Use of messaging apps		X			
Use of video broadcasting, e.g. YouTube		X			

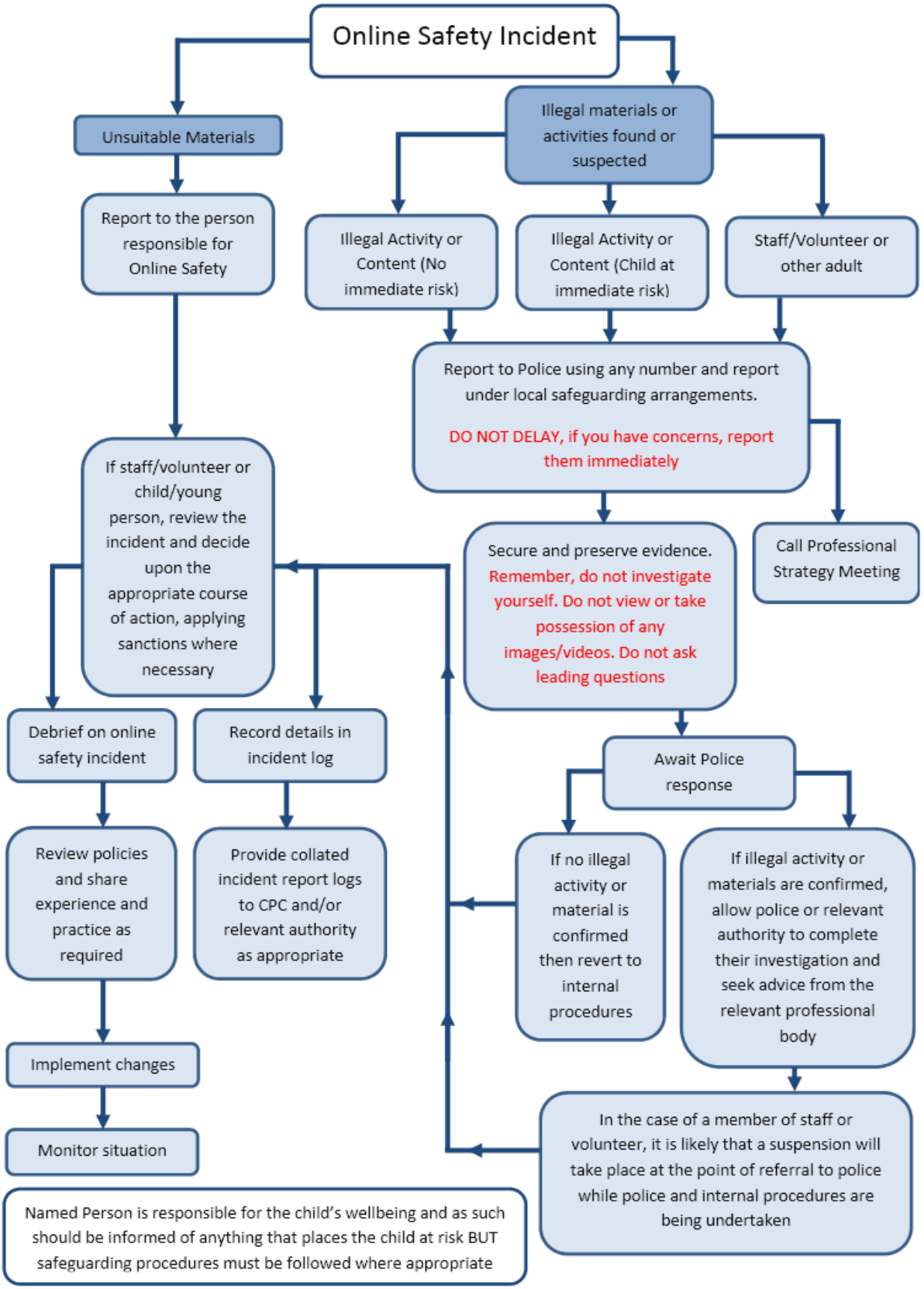
(The school should agree its own responses and place the ticks in the relevant columns, in the table above. They may also wish to add additional text to the column(s) on the left to clarify issues. The last section of the table has been left blank for schools/colleges to decide their own responses).

Responding to incidents of misuse

This guidance is intended for use when staff need to manage incidents that involve the use of online services. It encourages a safe and secure approach to the management of the incident. Incidents might involve illegal or inappropriate activities (see ‘User actions’ above).

Illegal incidents

If there is any suspicion that the website(s) concerned may contain child abuse images, or if there is any other suspected illegal activity, refer to the right hand side of the flowchart (below and appendix) for responding to online safety incidents and report immediately to the police.


Online Safety Incident
Unsuitable Materials
Illegal materials or activities found or suspected
Report to the person responsible for Online Safety
Illegal Activity or Content (No immediate risk)
Illegal Activity or Content (Child at immediate risk)
Staff/Volunteer or other adult
Report to Police using any number and report under local safeguarding arrangements.
DO NOT DELAY, if you have concerns, report them immediately
If staff/volunteer or child/young person, review the incident and decide upon the appropriate course of action, applying sanctions where necessary
Secure and preserve evidence. Remember, do not investigate yourself. Do not view or take possession of any images/videos. Do not ask leading questions
Call Professional Strategy Meeting
Debrief on online safety incident
Record details in incident log
Await Police response
Review policies and share experience and practice as required
Provide collated incident report logs to CPC and/or relevant authority as appropriate
If no illegal activity or material is confirmed then revert to internal procedures
If illegal activity or materials are confirmed, allow police or relevant authority to complete their investigation and seek advice from the relevant professional body
Implement changes
Monitor situation
In the case of a member of staff or volunteer, it is likely that a suspension will take place at the point of referral to police while police and internal procedures are being undertaken
Named Person is responsible for the child's wellbeing and as such should be informed of anything that places the child at risk BUT safeguarding procedures must be followed where appropriate

Other incidents

It is hoped that all members of the school community will be responsible users of digital technologies, who understand and follow school policy. However, there may be times when infringements of the policy could take place, through careless, irresponsible or, very rarely, through deliberate misuse.

In the event of suspicion, all steps in this procedure should be followed.

- Have more than one senior member of staff/volunteer involved in this process. This is vital to protect individuals if accusations are subsequently reported.
- Conduct the procedure using a designated computer that will not be used by learners and if necessary can be taken off site by the police should the need arise. Use the same computer for the duration of the procedure.
- It is important to ensure that the relevant staff should have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
- Record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed and attached to the form (except in the case of images of child sexual abuse – see below).
- Once this has been completed and fully investigated the group will need to judge whether this concern has substance or not. If it does then appropriate action will be required and could include the following:
  - internal response or discipline procedures
  - involvement by local authority or national/local organisation (as relevant).
  - police involvement and/or action
- **If content being reviewed includes images of child abuse then the monitoring should be halted and referred to the police immediately. Other instances to report to the police would include:**
  - incidents of ‘grooming’ behaviour
  - the sending of obscene materials to a child
  - adult material which potentially breaches the Obscene Publications Act
  - criminally racist material
  - promotion of terrorism or extremism
  - other criminal conduct, activity or materials.
- Isolate the computer in question as best you can. Any change to its state may hinder a later police investigation.

It is important that all of the above steps are taken as they will provide an evidence trail for the school and possibly the police and demonstrate that visits to these sites were carried out for safeguarding purposes. The completed form should be retained by the group for evidence and reference purposes.

School actions

It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures as follows:

Learner actions

Incidents	Refer to class teacher/tutor	Refer to Head of Department/Head of Year/other	Refer to Headteacher/Principal	Refer to Police	Refer to technical support staff for action re filtering/ security etc.	Inform parents/carers	Removal of network/internet access rights	Warning	Further sanction, e.g. detention/exclusion
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable/inappropriate activities).	x	X	X	X	x	x	x	x	
Unauthorised use of non-educational sites during lessons.	x	x	x						
Unauthorised use of mobile phone/digital camera/other mobile device.	x	x	x						
Unauthorised use of social media/messaging apps/personal e-mail.	x	x	x		x	x			
Unauthorised downloading or uploading of files.	x	x	x						
Allowing others to access school network by sharing username and passwords.	x	x	x		x				
Attempting to access or accessing the school network, using another learners' account.	x	x	x						
Attempting to access or accessing the school network, using the account of a member of staff.	x	x	x		x				
Corrupting or destroying the data of other users.	x	x	x					x	
Sending an email, text or message that is regarded as offensive, harassment or of a bullying nature.	x	x	x	x	x			x	
Continued infringements of the above, following previous warnings or sanctions.	x	x	x	x	x	x	x	x	x
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school.	x	x	x	x	x	x	x	x	x
Using proxy sites or other means to subvert the school's filtering system.	x	x	x	x	x	x	x	x	x
Accidentally accessing offensive or pornographic material and failing to report the incident.	x	x	x		x	x			
Deliberately accessing or trying to access offensive or pornographic material.	x	x	x	x	x	x	x	x	x
Receipt or transmission of material that infringes the copyright of another person or infringes the Data Protection Act.	x	x	x	x	x	x	x	x	x

Staff Actions

Incidents	Refer to line manager	Refer to Headteacher/ Principal	Refer to local authority/ HR	Refer to Police	Refer to Technical Support Staff for action re filtering, etc.	Warning	Suspension	Disciplinary action
Deliberately accessing or trying to access material that could be considered illegal (see list in earlier section on unsuitable/inappropriate activities)	x	X	X	X	x	x	x	x
Inappropriate personal use of the internet/social media/personal e-mail	x	x		x	x	x		
Unauthorised downloading or uploading of files.	x	x				x		
Allowing others to access school network by sharing username and passwords or attempting to access or accessing the school network, using another person's account.	x	x	x		x	x		
Careless use of personal data, e.g. holding or transferring data in an insecure manner	x	x	x			x		
Deliberate actions to breach data protection or network security rules.	x	x	x			x	x	
Corrupting or destroying the data of other users or causing deliberate damage to hardware or software	x	x		x	x	x	x	
Sending an e-mail, text or message that is regarded as offensive, harassment or of a bullying nature.	x	x	x	x	x	x	x	x
Using personal email/social networking/messaging to carrying out digital communications with learners.	x	x	x			x		
Actions which could compromise the staff member's professional standing	x	x	x	x	x	x	x	x
Actions which could bring the school into disrepute or breach the integrity of the ethos of the school.	x	x	x	x	x	x	x	x
Using proxy sites or other means to subvert the school's/college's filtering system.	x	x	x		x	x		
Accidentally accessing offensive or pornographic material and failing to report the incident.	x	x	x		x			
Deliberately accessing or trying to access offensive or pornographic material	x	x	x	x	x	x	x	x
Breaching copyright or licensing regulations.	x	x	x	x	x	x	x	x
Continued infringements of the above, following previous warnings or sanctions.	x	x	x	x	x	x	x	x

Appendix

Copies of the more detailed template policies and agreements, contained in the appendix, can be downloaded from:

https://dysgu.hwb.gov.wales/playlists/view/dfdcd1d6-21b0-46ac-b6bb-fc83402ef3d7/en#page1

Acknowledgements

Welsh Government and SWGfL would like to acknowledge a range of individuals and organisations whose policies, documents, advice and guidance have contributed to the development of this school online safety policy templates and of the 360 degree safe Cymru online safety self review tool:

- Members of the SWGfL online safety group
- Representatives of Welsh local authorities
- Representatives from a range of Welsh schools/colleges involved in consultation and pilot groups
- Plymouth University online safety